

To: Lucy McInerney
Site Manager
WA Department of Ecology
3190 160th Ave SE
Bellevue, WA 98008-5452

Transmitted Via Online Portal: <http://cs.ecology.commentinput.com/?id=bRZ7W>

7/23/19

RE: Draft Cleanup Action Plan for the Central Waterfront Cleanup site

Dear Ms. McInerney,

Thank you for taking the time to consider our comment on the Draft Cleanup Action Plan (CAP) for the Central Waterfront Cleanup site located in Bellingham Bay. We are encouraged by the continued progress made by the cleanup efforts on the Bellingham Bay toxic sites that are legacies of our uninformed industrial past.

RE Sources for Sustainable Communities is a local organization in northwest Washington, founded in 1982. RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. Our North Sound Baykeeper program is dedicated to protecting and enhancing the marine and nearshore habitats of northern Puget Sound and the Georgia Strait. Our chief focus is on preventing pollution from entering the North Sound and Strait, while helping our local citizenry better understand the complex connections between prosperity, society, environmental health, and individual wellbeing. Our North Sound Baykeeper is the 43rd member of the Waterkeeper Alliance, with over 300 organizations in 34 countries around the world that promote fishable, swimmable, drinkable water. RE Sources has over 20,000 members in Whatcom, Skagit, and San Juan counties, and we submit these comments on their behalf.

Our biggest concern with the proposed CAP is that upon completion of the cleanup it is expected to take an additional 20 to 25 years for the groundwater to meet human health and environmental standards. The CAP document states that because considerable landfill material will be left in place there will be a continued supply of toxic material that will continue to contaminate the groundwater. We feel that this time frame is too long and request that the Department of Ecology (Ecology) modify the CAP, perhaps by incorporating a barrier, partial or complete around the landfill, or if possible, implementing in situ soil and groundwater treatment, to reduce this time frame.



In addition, when talking about the monitored natural attenuation (MNA) that is taking place on the site we would appreciate it if Ecology would define exactly what is occurring. Is there attenuation simply because of dilution over time? Or, are there microbial actions, chemical reactions, or soil interactions that are explaining the attenuation of contaminants? In our opinion, there is a big distinction between a contaminant being broken down or digested versus simply being diluted, particularly for persistent contaminants that are released into the marine environment.

We are appreciative of the effort that Ecology, Port of Bellingham, and the City of Bellingham have made to help educate the public about the cleanup efforts and to encourage citizens to send in comments. One place that Ecology could improve upon is the readability of the CAP document. Some suggestions are:

- The current site conditions, section 2.5, should be expanded to provide a clearer overview of the site. We found that we had to read the entire document before we fully understood the current conditions. For example this section should include:
 - The types of metals found in all 3 subareas. It is only provided for Hilton Avenue Properties (arsenic and lead). Not until much later in the document are all the metals found on the site disclosed.
 - Definitions and differentiations between landfill-associated gas, soil gas, and vapor.
 - A table that includes the current levels of contaminants found at the site along with the cleanup level goals so that readers can easily see the magnitude of contamination.
- We find section 3.3.1, discussion on groundwater point of compliance, to be confusing and potentially misleading. We interpret this section to say that because the source of contaminants (the landfill) are being left in place the standard, more stringent, groundwater standards can not be met (deemed not practical); therefore, less stringent, conditional standards are allowed to be used. In a later section, the document explains that groundwater standards are not expected to be met for 20-25 years. Please explain this in language that people can easily understand. In this case we feel that more effort was spent justifying the issue through discussing the Washington Administrative Code than explaining what is actually occurring. We feel that this is an important aspect of the project that the public should fully understand.

The treatment of stormwater to avoid recontamination was not addressed in this document. Perhaps it was discussed in the Remedial Investigation/Feasibility Study (RI/FS) but it should be included in the CAP or at minimum the reader should be directed to the proper section in the RI/FS to find this information. This also goes for an assessment of how the effects of seismic activity and sea level rise, including storm surges, could impact cleanup efforts at the site. These are also concerns expressed by Bellingham residents who attended the walking tour of the site on July 10th.

Lastly, in conversation with the Port of Bellingham we learned that the fate of the Aerated Stabilization Basin (ASB) has not been determined. While it is likely to stay within the classification of Marine Trades it is not necessarily going to be a marina. It is currently functioning as a settling pond for stormwater which we feel is important as the central waterfront will remain an industrial area with industrial related stormwater runoff. We would like to see the ASB retain this function in addition to providing habitat. While it can never function like the productive mudflat it was before it was filled in, there are still measures that can be done to increase habitat potential.

Thank-you for reading our comment letter and taking our recommendations into consideration. We appreciate the opportunity to play an active role in the toxic cleanup process in Bellingham Bay and feel this collaborative approach will result in a more comprehensive cleanup.

Sincerely,
Kirsten McDade, Pollution Prevention Specialist
Clean Water Team